

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In The Matter Of:	)	
	)	
Beverly Holloman	)	Case Number: 19-42723-399
	)	
Debtor	)	
	)	Chapter 13
PennyMac Loan Services, LLC, or its	)	
successors and assigns	)	Notice of Forbearance due to the
	)	COVID-19 Pandemic
Movant,	)	
	)	
vs.	)	Millsap & Singer, LLC
	)	612 Spirit Drive
Beverly Holloman	)	St. Louis, MO 63005
	)	(636) 537-0110
	)	
and	)	
	)	
Diana S. Daugherty	)	
	)	
Trustee	)	
	)	
Respondents	)	
	)	

**NOTICE OF FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

COMES NOW, PennyMac Loan Services, LLC ("Creditor), by and through undersigned counsel, and hereby submits this Notice of Forbearance Agreement to the Court regarding the request of the Debtor for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently requested a forbearance period of 3 months in which the Debtor will not tender mortgage payments to Creditor that would come due on the mortgage starting April 01, 2020 through June 01, 2020. Creditor holds a secured interest in real property commonly known as 3924 Tipton Dr, Saint Louis, MO 63134 as evidenced by claim number 13 on the Court's claim register. Creditor, at this time, does

not waive any rights to collect the payments that come due during the forbearance period after the forbearance plan ends. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect any post-petition escrow shortage. During the forbearance period Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

Because of the uncertainties surrounding how long this pandemic will last, Creditor will work with Debtor or Counsel for Debtor to determine when Debtor will be able to resume making mortgage payments and when/how the Debtor will cure the delinquency created by the forbearance period ("forbearance arrears"). Once the forbearance plan ends and the Creditor and Debtor or Counsel for Debtor agree on an appropriate repayment or loss mitigation program, Creditor will file a notice or an amended/supplemental claim consistent with local practice.

Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the mortgage, including, but not limited to, a lapse in insurance coverage or non-payment of property taxes.

Dated April 28, 2020

Respectfully Submitted,  
Millsap & Singer, LLC

/s/ Christopher D. Lee

Cynthia M. Kern Woolverton, #47698, #47698MO

Stewart C. Bogart, #67956, #67956MO

Muhammad Esa Ahmed, #70619, #70619MO

Christopher D. Lee, #63024, #63024MO

Attorneys for Movant

612 Spirit Drive

St. Louis, MO

Telephone: (636) 537-0110

Facsimile: (636) 537-0067

bkty@msfirm.com

Attorneys for PennyMac Loan Services, LLC

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on April 28, 2020, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court pursuant to CM/ECF as set out on the Notice of Electronic filing as issued by the Court or in the alternative has been served by depositing a true and correct copy of same enclosed in a postage prepaid, properly addressed envelope, in a post office official depository under the exclusive care and custody of the United States Postal Service within the state of Missouri on those parties directed by the Court on the Notice of Electronic Filing issued by the Court as required by the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court.

/s/ Christopher D. Lee

### **Electronic Mail Notice List**

The following is the list of attorneys who are currently on the list to receive e-mail notices for this case.

Timothy Patrick Powderly  
tim@powderlylaw.com

Diana S. Daugherty  
standing\_trustee@ch13stl.com

Office of the United States Trustee

### **Manual Notice List**

The following is a list of parties who are not on the list to receive e-mail notices for this case (who therefore require manual noticing).

Beverly Holloman  
3924 Tipton Drive  
St Louis, MO 63134